



5 Waller Avenue • Suite 200 • White Plains, NY • 10601  
tel (914) 353-3850 • fax (914) 353-3851 • [wshblaw.com](http://wshblaw.com)

John A. Darminio  
**direct dial** (914) 353-3861  
email [jdarminio@wshblaw.com](mailto:jdarminio@wshblaw.com)

March 14, 2023

Honorable Gregory H. Woods  
United States District Judge  
United States District Court  
Southern District of New York  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

***Re: U.S. ex rel. Donohue v. Carranza, et al  
1:20-CV-5396 (GHW)(SDA)***

Dear Judge Woods:

This firm represents the Wake County Public School District and Superintendent Cathy Quiroz Moore (collectively “Wake County Defendants”), in the above-referenced matter.

Consistent with the requests made by other moving Defendants and this Court’s Individual Rules of Practice, Wake County Defendants respectfully request an extension of time of thirty (30) days until April 13, 2023, to file a motion for attorneys’ fees under 31 U.S.C. § 3730(d)(4) and F.R.C.P. Rule 54(d). This is the first requested extension of time and counsel for the Plaintiff-Relator has consented to the request.

Respectfully submitted,

*/s/John A. Darminio*  
John A. Darminio

Cc: All counsel of record via ECF